

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-60143-CR-SMITH/VALLE

UNITED STATES OF AMERICA,

v.

STUART LEIBOV,

Defendant.

FACTUAL PROFFER

The United States of America and **STUART LEIBOV** (“defendant”), hereby agree that, had this case proceeded to trial, the United States would have proven beyond a reasonable doubt the following facts, which occurred in the Southern District of Florida and elsewhere:

On or about June 29, 2022, FBI Los Angeles Division executed a residential search warrant pertaining to production of child pornography and extortion via Discord. While interviewing the subject of the residential search warrant, the subject disclosed that while utilizing username “Vecker,” the subject engaged in enticement activity with numerous underage victims on Discord. The subject discussed a particular conversation with Discord user “pxppy.chow” that occurred in May 2022. The subject showed, and allowed the interviewing agents to photograph, the messages between them. In pertinent part, the user of the Discord pxppy.chow account discussed having had her virginity taken by another person who lived only an hour away from her, and that she and the other person had video-recorded him “raping” her two days before. The user of the Discord pxppy.chow account also said that the other person was twenty-five years old, and there was a twelve-year age difference between them.

On or about June 30, 2022, Discord and AT&T responded to an administrative subpoena for account pxppy.chow and provided the following subscriber information: user identification number: 962786414766997534; Discord username: pxppy.chow#0092; email address: apples*****@gmail.com; registration IP address: 99.178.151.201, account registration date: April 10, 2022, 18:49:28 UTC.

On or about July 1, 2022, AT&T provided information that IP address 99.178.151.201 belonged to a residence located in West Palm Beach, Florida. That same day, your affiant made contact with the residents of the West Palm Beach, Florida address, including a minor, who was 15 years of age, hereinafter referred to as “the MINOR VICTIM.” With the MINOR VICTIM’s mother’s consent, your affiant seized two electronic devices used by the MINOR VICTIM, including a cellular telephone, more specifically described as an Apple iPhone 13 with IMEI 35733236864288, and a Dell computer. Additionally, your affiant scheduled a Child and Adolescent Forensic Interview (“CAFI”) for a future date.

On or about July 12, 2022, the MINOR VICTIM participated in a forensic interview and disclosed that she had created and operated the Discord account pxppy.chow as well as additional Discord accounts. The MINOR VICTIM also disclosed that she used multiple email addresses to create online accounts, including c*****@icloud.com and a*****@gmail.com, and usernames, including, but not limited to: render, mutt, pxppy.x, and C-Corpse Husband. The MINOR VICTIM shared that she joined Discord at the age of approximately 11 or 12 years old (or approximately 2017 to 2018).

From the age of approximately 13 years old to the present, the MINOR VICTIM stated that she used her Apple iPhone 13 to communicate online in various social media forums, including Discord, Instagram, and Twitter. The MINOR VICTIM also used her Apple iPhone 13 to message

and call adult males. The MINOR VICTIM advised she produced and distributed images and videos of child pornography (of herself) at the request of adult males she met through online forums. The MINOR VICTIM disclosed that these adult males sometimes paid the MINOR VICTIM for this content in the form of gift cards or games. The MINOR VICTIM stated that she used multiple online user accounts to transmit these images and videos. The MINOR VICTIM disclosed that she used an online service called "Mega" to distribute the images and videos of child pornography (of herself) that she produced.

A forensic review of the MINOR VICTIM's Apple iPhone 13 revealed limited information, including but not limited to, access to the internet and more specifically, Google searches and calendar entries referencing FaceTime video calls. The forensic review also revealed Log Entries associated with the iTunes Store, iCloud, Mega.NZ, and Instagram. Finally, the review produced one-hundred forty-seven (147) contacts and associated telephone numbers.

Of the 147 contacts in the MINOR VICTIM's phone, only one was labeled as "Stuart". The "Stuart" contact had a flower emoji beside it, a cartoon character as the picture, and a telephone number of (954) 415-3166. An administrative subpoena to AT&T for customer records pertaining to the telephone number associated with "Stuart," (954) 415-3166 identified STUART LEIBOV (hereinafter referred to as "LEIBOV") as the subscriber.

The MINOR VICTIM described that in approximately January 2022, the MINOR VICTIM began communicating with LEIBOV, an adult male, that she met on a group chat on Discord. LEIBOV told the MINOR VICTIM that he lived in Florida, a couple of hours away from her. Over the course of their communications, the MINOR VICTIM told LEIBOV where she went to school and gave him her home address. He eventually drove to meet the MINOR VICTIM, and they engaged in sexual activities, including oral and vaginal intercourse. LEIBOV also captured images

and videos the MINOR VICTIM engaging in sexual activity. The MINOR VICTIM provided a physical description of LEIBOV and stated that she had saved LEIBOV in her phone as "Stuart."

Later, on October 11, 2022, the MINOR VICTIM identified LEIBOV from a photographic array containing multiple photographs of similarly looking white males. The MINOR VICTIM described LEIBOV's vehicle as a blue sedan.

On or about November 17, 2022, in response to a federal search warrant, Discord produced records for the MINOR VICTIM's account. In addition to multiple direct messages between the MINOR VICTIM's account and various Discord subscribers in which the MINOR VICTIM distributed images and videos of child pornography (of herself) that she produced at the request of others, Discord also provided messages between the MINOR VICTIM's account and Discord username "Epikwintime#6402". In response to a subpoena Discord provided that the user of "Epikwintime#6402" was LEIBOV using telephone number (954) 415-3166 (the same as identified from the MINOR VICTIM's phone).

On December 23, 2022, in response to the service of a federal search warrant, Discord produced records for LEIBOV that included communication with the MINOR VICTIM as well as photographs and videos files of the MINOR VICTIM. Those files included the MINOR VICTIM performing oral sex on LEIBOV or the MINOR VICTIM engaging in other sexual activity such as masturbating or displaying her vagina.

On or about February 16, 2023, your affiant received a federal search warrant for records previously received by the New Zealand company, Mega, after an informal information request on two specific Mega files distributed by LEIBOV as well as accounts associated with LEIBOV's email addresses. Mega provided user account details for stuartleibov@yahoo.com and epikwintime@gmail.com, as well as two videos associated with the distributed links by LEIBOV.

One video titled "sock," approximately four minutes and 50 seconds in length depicted an unknown person, purportedly LEIBOV, inserting a pink dildo into the MINOR VICTIM's vagina. The other video titled "VID-20171030-WA0081," approximately one minute and 56 seconds in length, depicted an adult male inserting his penis into another male's, age unknown, anus.

LEIBOV was arrested on March 31, 2023, and at that time a search warrant was executed on his residence located at 9050 NW 49th Place Coral Springs, Florida 33067. He admitted, post Miranda, to communicating online with both boys and girls for sexual purposes. He advised he has been downloading child pornography since he was 15 years old. He admitted to receiving sexual gratification from the images and videos of the children engaged in sexual activity. He indicated his preference are children ages 13 years and up.

He was found to be in possession of images and videos of children under the age of 18 years engaged in sexual activity from December 22, 2022, to March 31, 2023. The foregoing events occurred in Broward County, in the Southern District of Florida.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

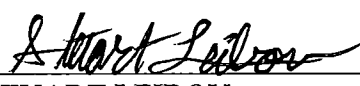
Date: 1-10-2024 By: _____


M. CATHERINE KOONTZ
UNITED STATES ATTORNEY

Date: 1-10-2024 By: _____


FRANK MAISTER
ATTORNEY FOR STUART LEIBOV

Date: 1-10-2024 By: _____


STUART LEIBOV
DEFENDANT